

1 BROWNE GEORGE ROSS LLP
Eric M. George (State Bar No. 166403)
2 egeorge@bgrfirm.com
Keith Wesley (State Bar No. 229276)
3 kwesley@bgrfirm.com
Jonathan Gottfried (State Bar No. 282301)
4 jgottfried@bgrfirm.com
2121 Avenue of the Stars, Suite 2400
5 Los Angeles, California 90067
Telephone: (310)274-7100
6 Facsimile: (310) 275-5697

7 Attorneys for Plaintiff
DFSB Kollektive Co. Ltd.

8 Ekwan E. Rhow - State Bar No. 174604
9 eer@birdmarella.com
Timothy B. Yoo - State Bar No. 254332
10 tby@birdmarella.com

BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
11 DROOKS, LINCENBERG & RHOW, P.C.
1875 Century Park East, 23rd Floor
12 Los Angeles, California 90067-2561
Telephone: (310) 201-2100
13 Facsimile: (310) 201-2110

14 Attorneys for Defendants CJ E&M, Inc.
and CJ E&M America, Inc.

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
18

19 DFSB KOLLECTIVE CO. LTD.,

20 Plaintiff,

21 vs.

22 CJ E&M, INC., a Korean corporation;
CJ E&M AMERICA, INC., a California
23 corporation,

24 Defendants.

CASE NO. 2:15-cv-01650-SVW-FFM

**STIPULATION FOR PROTECTION
OF CONFIDENTIAL
INFORMATION AND [PROPOSED]
PROTECTIVE ORDER**

Assigned to Hon. Stephen V. Wilson

1 Plaintiff DFSB Kollektive Co., Ltd. (“Plaintiff”) and defendants CJ E&M,
2 Inc. and CJ E&M America, Inc. (collectively, “Defendants” and together with
3 Plaintiff, the “Parties”) respectfully submit this stipulation pursuant to Federal Rule
4 of Civil Procedure 26(c) to maintain the confidentiality of certain information and
5 materials that will be exchanged between Parties. In support of this stipulation, the
6 Parties state as follows:

7 WHEREAS, the Parties possess proprietary, sensitive, and confidential
8 materials that, if publicly disclosed, would cause substantial harm to both Parties;

9 WHEREAS, Plaintiff alleged in its Complaint that Defendants had infringed
10 on Plaintiff’s copyrights and had committed a violation of the Digital Millennium
11 Copyright Act;

12 WHEREAS, it is likely that documents produced in this action will relate to
13 the claims alleged in the Complaint;

14 WHEREAS, the categories of documents expected to be produced include
15 documents related to: confidential internal communications, business negotiations,
16 consumer information, sensitive financial data;

17 WHEREAS, the unprotected disclosure of this information could seriously
18 and materially affect both parties’ commercial interests, and unnecessarily expose
19 them to competitive business harm;

20 WHEREAS, if for any reason the Court were to determine not to enter the
21 attached proposed Stipulated Protective Order, the Parties agree to cooperate and
22 work in good faith to submit a revised proposed protective order satisfactory and
23 acceptable to the Court;

24 THEREFORE, the Parties respectfully request that the Court enter the
25 attached proposed Stipulated Protective Order.

26 ///

27 ///

28 ///

1 DATED: October 5, 2015

Eric M. George
Keith Wesley
Andrew A. August
Jonathan Gottfried
BROWNE GEORGE ROSS LLP

5 Bv: /s/ Jonathan Gottfried
Jonathan Gottfried
Attorneys for Plaintiff DFSB Kollektive
Co. Ltd.

8 DATED: October 5, 2015

Ekwan E. Rhow
Timothy B. Yoo
Bird, Marella, Boxer, Wolpert, Nessim,
Drooks, Lincenberg & Rhow, P.C.

13 By: /s/ Timothy B. Yoo
Timothy B. Yoo
Attorneys for Defendant CJ E&M
America, Inc.

SIGNATURE CERTIFICATION

I hereby certify that the content of this document is acceptable to Timothy B. Yoo, counsel for defendants, and that I have obtained their authorization to file this document.